

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CV-23730-RAR

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ALL ASSETS ON DEPOSIT AND RESTRAINED IN
BROKERAGE ACCOUNT NO. 20010195
AT SAFRA NATIONAL BANK OF NEW YORK;**

**ALL ASSETS ON DEPOSIT AND RESTRAINED IN
CORPORATE CHECKING ACCOUNT NO.
17271261 AT SAFRA NATIONAL BANK OF NEW
YORK; and**

**ALL ASSETS ON DEPOSIT AND RESTRAINED IN
CORPORATE CHECKING ACCOUNT NO.
17271253 AT SAFRA NATIONAL BANK OF NEW
YORK,**

Defendants *In Rem*.

_____ /

**INSTITUTO DE SEGURIDAD SOCIAL DE LA POLICIA
NACIONAL,**

Claimant.

_____ /

ASEGURADORA DEL SUR,

Claimant.

_____ /

SAFRA NATIONAL BANK OF NEW YORK,

Claimant.

_____ /

**SECOND JOINT STATUS REPORT FILED IN COMPLIANCE WITH ORDER
REQUIRING STATUS UPDATE [ECF No. 65]**

In compliance with this Court's Order at ECF No. 65, the United States of America and Claimants, Instituto de Seguridad Social de la Policia Nacional ("ISSPOL"), Aseguradora Del Sur ("ADS"), and Safra National Bank of New York ("Safra" and, together with the United States, ISSPOL, and ADS, the "Parties"), through the undersigned respective counsel, hereby file this joint status report, stating as follows.

1. On March 4, 2025, the Parties filed a joint status report in compliance with this Court's Order Granting in Part and Denying in Part Consent Motion, ECF No. 63, ("Initial Status Report"), ECF No. [64].

2. After the filing of the Initial Status Report on March 4, 2025, the Court entered an Order requiring the Parties to file a status update on or before June 2, 2025. *See* Paperless Order, ECF No. [65].

3. As set forth in the Initial Status Report, the United States Attorney's Office must receive approval for the settlement from the Deputy Attorney General of the United States Department of Justice due to the monetary amount involved in this case and settlement. *See* Asset Forfeiture Policy Manual Ch.10.II.A (2025).¹ While the approval process has begun, it can exceed six months.

4. The United States' proposed settlement agreement with ISSPOL and ADS remains under review by management within the United States Attorney's Office whose approval is required prior to submission of the proposed settlement to the Money Laundering and Asset Recovery Section of the United States Department of Justice, and, ultimately, the

¹ Available at <https://www.justice.gov/criminal/criminal-afmls/file/839521/dl>.

Deputy Attorney General.

5. Should the Court deem a subsequent joint status report to be appropriate, the Parties respectfully propose a deadline of no sooner than 90 days from this filing.

Respectfully submitted,
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